

JAMI L. FERRARA
California State Bar Number 189109
Law Office of Jami L. Ferrara
964 Fifth Avenue, Suite 335
San Diego, California 92101
Telephone: (619) 239-4344
Facsimile: (619) 544-1429
Email: jamiferrara@msn.com

Attorney for Mr. Boulch

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,
Plaintiff,

v.

DENNIS MICHAEL BOULCH,
Defendant.

Case No. 08CR1977-BEN

**NOTICE OF JOINT MOTION TO
CONTINUE SENTENCING HEARING**

TO: KAREN HEWITT, UNITED STATES ATTORNEY,
STEVEN DE SALVO, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that the defendant, Dennis Michael Boulch, by and through his counsel, Jami L. Ferrara, Esq., is asking this Court to enter an order granting the following joint motion to continue the Sentencing Hearing scheduled for Monday, September 15, 2008 at 9:00 a.m. to Monday, November 3, 2008 at 9:00 a.m..

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MOTION

The defendant, Dennis Michael Boulch, by and through his attorney, Jami L. Ferrara, Esq., jointly with the plaintiff, the United States of America, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to continue the motion hearing scheduled for Monday, September 15, 2008 at 9:00 a.m. to Monday, November 3, 2008 at 9:00 a.m..

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

S/Jami L. Ferrara

Dated: September 2, 2008

JAMI L. FERRARA
Attorney for Mr. Boulch

S/Steven De Salvo

Dated: September 2, 2008

STEVEN DE SALVO
Assistant United States Attorney

PROOF OF SERVICE

I, Jami L. Ferrara, do hereby state:

I am a citizen of the United States and a resident of the County of San Diego, State of California. I am over the age of eighteen years, and am not a party to the within action. My business address is 964 Fifth Avenue, Ste. 335, San Diego, California 92101.

On the this 2^d day of September 2008, I served the within **JOINT MOTION TO CONTINUE SENTENCING HEARING** in Case No. 08CR1977-BEN electronically through the CM/ECF system for the Southern District of California on the United States Attorney's Office, AUSA Steven DeSalvo, specifically, a registered user of the CM/ECF system.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED this day, 2 September 2008, at San Diego, California.

S/Jami L. Ferrara

JAMI L. FERRARA

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Defendant.

Case No. 08CR1977-BEN

**JOINT MOTION TO CONTINUE
SENTENCING HEARING**

I.

THE PARTIES JOINTLY MOVE TO CONTINUE THE SENTENCING HEARING

The parties jointly move this Court to continue the Sentencing Hearing currently scheduled for Monday, September 15, 2008 at 9:00 a.m. to Monday, November 3, 2008 at 9:00 a.m.. Defense counsel has obtained approval from the Court for a Psychological Evaluation of Mr. Boulch, however, there is insufficient time to complete the Evaluation and Report by the date currently set for sentencing.

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1 A proposed order to this effect has been submitted to this Court by electronic
2 mail, per the procedures for the CM/ECF System.

3
4 Respectfully submitted,

5 *S/Jami L. Ferrara*

6 Dated: September 2, 2008

JAMI L. FERRARA
Attorney for Mr. Boulch

8 *S/Steven De Salvo*

9 Dated: September 2, 2008

STEVEN DE SALVO
Assistant United States Attorney